

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,	:	Case No. 3:22-CR-87
Plaintiff,	:	JUDGE MICHAEL J. NEWMAN
vs.	:	
FREDERICK CLARK FRY,	:	MOTION TO FILE DOCUMENT
Defendant.	:	UNDER SEAL

Now comes the United States Attorney and moves this Court, pursuant to its inherent power to control papers filed with the Court, for authorization to file the Government's Sentencing Memorandum under seal and issue a protective order sealing said document from public inspection until otherwise directed by this Court. In support of this Motion, the United States Attorney states that the disclosure of the document is not warranted, that the document contains sensitive information that may possibly be used to identify victims, and contains sensitive information related to the defendant, and that the nature of the case warrants sealing this document.

WHEREFORE, the United States of America respectfully requests authorization to file the Government's Sentencing Memorandum under seal and issue a protective order that said document be sealed and kept from public inspection until otherwise ordered by this Court.

Respectfully submitted,

KENNETH L. PARKER
UNITED STATES ATTORNEY

/s/ Christina E. Mahy
CHRISTINA MAHY (0092671)
Assistant United States Attorney
Attorney for Plaintiff

Federal Building
200 West Second Street, Suite 600
Dayton, Ohio 45402
(937) 225-2910
Fax: (937) 225-2564
Christina.mahy@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion for Leave to File Under Seal was served, via ECF, upon counsel for defendant on this 23rd day of February, 2023.

/s/ Christina E. Mahy
CHRISTINA MAHY (0092671)
Assistant United States Attorney